REMARKS

At the outset, the Applicants wish to thank Examiner Pham and Examiner Oni for discussing the present application with Applicants' attorneys in a telephone conference held on May 3, 2007 (herein, the "Interview"). In addition, the Applicants thank the Examiners for providing the Interview Summary dated May 7, 2007.

Claims 1-25 are pending in the present application, of which Claims 1, 7, and 19 are in independent form. Claims 1, 7, 19 and 21 are amended to recite methods and systems for navigating a collection of tree data structures to identify a plurality of distinct trees. In addition, Claims 1, 7, and 19 are amended to call for methods and systems wherein information related to the identified trees is returned. Support for these amendments may be found in the present application as published (U.S. Publication No. 2005/0065965) at least at paragraphs [0070]-[0083] and Figures 1, 2a, 2b, 4 and 6. For at least the reasons set forth in detail below, Applicants respectfully submit that Claims 1-25 are in condition for allowance.

Rejection under 35 U.S.C. § 101

In the Office Action, Claims 1-6 stand rejected as directed to non-statutory subject matter. In particular, the Office Action asserts that Claims 1-6 do not produce a tangible result that has a real world value. In view of this rejection, Claim 1 has been amended to call for the step of "displaying the data in a select node of the identified trees." Applicants respectfully submit that this amendment overcomes the 35 U.S.C. §101 rejection.

Rejection under 35 U.S.C. § 102(b)

In the Office Action, Claims 1-25 stand rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 6,411,957 (herein "Dijkstra"). It is well-established that for a reference to defeat a claim's novelty under 35 U.S.C. § 102, it must disclose each and every

element of the claim. Applicants respectfully request that this rejection be withdrawn because Dijkstra fails to teach each and every claim limitation of Claims 1-25, as amended.

In the Office Action, the Examiner maintains that Dijkstra teaches a plurality of trees. In the Examiner's Interview Summary, the Examiner elaborated on this argument by suggesting "another way to interpret a plurality of trees is 1 tree comprising plurality of subtrees or branches, therefore Dijkstra teaches searching plurality of subtrees." (Examiner's Interview Summary, page 3; typographical errors corrected). During the Interview, the Examiners pointed to Figure 1A of Dijkstra as an illustration of a single tree including a plurality of subtrees (e.g., the single tree having root node A includes a plurality of subtrees having root nodes B, C, D, E, F, and G).

As described in detail in the specification of the present application, the claimed method and system are directed to the navigation of a forest of distinct trees (i.e., trees that are not connected by a common root or parent node) in order to identify the plurality of distinct trees that satisfy the constraint criteria. In the example illustrated in Figures 2a and 2b, 126 distinct trees are identified (U.S. Publication No. 2005/0065965, Figures 2b, step 7, column 208) from a forest of over 11 million trees (U.S. Publication No. 2005/0065965, Figures 2a, step 1, column 208).

Claims 1-25 as amended call for methods and systems for navigating a collection of tree data structures using a query tree to identify a plurality of distinct trees in a collection of tree data structures. (U.S. Publication No. 2005/0065965, paragraphs [0070]-[0083]). The trees identified according to the claimed invention are distinct from one another in that they are not connected to a common root or parent node.

In addition, Claims 1-25 as amended call for returning information related to the identified trees. (U.S. Publication No. 2005/0065965, paragraph [0076], Figure 2a). Further to

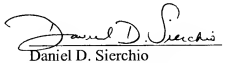
the example described above, pane 104 in Figure 1 illustrates the returning of information (e.g., nodes, node values, tree number) related to the 126 identified trees.

In contrast, Dijkstra teaches a system and method for organizing nodes within a single tree structure. (Dijkstra, column 1, lines 6-10). Even assuming arguendo that the branches of the single tree shown in Figure 1 represent subtrees, these subtrees are not distinct. Instead, they are clearly connected to a common root (i.e., node A). Dijkstra describes the identification of subtrees of a single tree which are connected via a common root node. Accordingly, there is no teaching in Dijkstra of identifying distinct trees, as called for in Claims 1-25 of the present application.

Furthermore, Dijkstra does not describe returning information related to the identified trees, as called for in Claims 1-25. Instead, Dijkstra describes returning the value of a particular node in a single tree. (Dijkstra, column 11, lines 9-32; Figure 3, steps 590 and 610).

Accordingly, because Dijkstra fails to teach each and every element of Claims 1-25, specifically the identification of a plurality of distinct trees and the return of information related to the identified trees, the Applicants respectfully request that the 35 U.S.C. §102(b) rejection based on Dijkstra be withdrawn. For at least the reasons set forth above, Claims 1-25 are deemed to be in condition for allowance. Reconsideration and favorable action in this regard is earnestly solicited.

Respectfully submitted,



Daniel D. Sierchio
Attorney for Applicants
Registration No. 53,591

Docket Administrator
Lowenstein Sandler PC
65 Livingston Avenue
Roseland, NJ 07068
Phone: (973) 597-2500